

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

J.K.J.,

Plaintiff,

v.

POLK COUNTY SHERIFF'S DEPARTMENT,  
DARRYL L. CHRISTENSEN,

Case No. 15-cv-428

Defendants,

and

WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION,

Intervenor.

---

**INTERVENOR WISCONSIN COUNTY MUTUAL INSURANCE CORPORATION'S  
ANSWER AND AFFIRMATIVE DEFENSES**

---

NOW COMES the Intervenor, Wisconsin County Mutual Insurance Corporation ("WCMIC"), by its undersigned attorneys, and for its Answer and Affirmative Defenses to Plaintiff's Second Amended Complaint states as follows:

1. The allegations contained in Paragraph 1 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.
2. The allegations contained in Paragraph 2 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.

3. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 3 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

4. In answering Paragraph 4 of Plaintiff's Second Amended Complaint, acknowledge that Plaintiff has demanded a jury trial. Denies any remaining allegations contained therein.

5. Admits the allegations contained in Paragraph 5 of Plaintiff's Second Amended Complaint.

6. Admits the allegations contained in Paragraph 6 of Plaintiff's Second Amended Complaint.

7. Admits the allegations contained in Paragraph 7 of Plaintiff's Second Amended Complaint.

8. The allegations contained in Paragraph 8 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.

9. The allegations contained in Paragraph 9 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.

10. In answering Paragraph 10 of Plaintiff's Second Amended Complaint, admits that at times relevant to this action, Defendant Christensen was employed by Polk County as a jail officer at the Polk County Jail. Denies the remaining allegations contained therein. Affirmatively alleges that Defendant Christensen's alleged sexual assault of Plaintiff was not committed within the scope of his employment or authority.

11. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 11 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

12. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 12 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 13 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

14. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 14 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

15. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 15 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

16. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 16 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

17. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

18. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

19. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

20. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 20 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

21. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

22. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 22 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

23. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 23 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

24. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

25. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

26. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

27. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 27 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

28. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

29. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 29 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

30. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 30 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

31. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 31 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

32. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

33. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 33 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

34. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 34 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

35. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 35 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

36. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 36 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

37. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 37 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

38. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 38 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

39. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 39 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

40. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 40 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

41. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 41 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

42. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 42 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

43. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 43 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

44. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 44 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

45. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 45 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

46. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 46 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

47. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 47 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

48. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 48 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

49. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 49 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

50. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 50 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

51. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 51 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

52. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 52 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.



53. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 53 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

54. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 54 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

55. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 55 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

56. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 56 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

57. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 57 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

58. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 58 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

59. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 59 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

60. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 60 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

61. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 61 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

62. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 62 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

63. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 63 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

64. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 64 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

65. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 65 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

66. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 66 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

67. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 67 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

68. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 68 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

69. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 69 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

70. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 70 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

71. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 71 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

72. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 72 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

73. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 73 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

74. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 74 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

75. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 75 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

76. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 76 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

77. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 77 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

78. In answering Paragraph 78 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

79. The allegations contained in Paragraph 79 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.

80. Denies the allegations contained in Paragraph 80 of Plaintiff's Second Amended Complaint.

81. Denies the allegations contained in Paragraph 81 of Plaintiff's Second Amended Complaint.

82. Denies the allegations contained in Paragraph 82 of Plaintiff's Second Amended Complaint.

83. Denies the allegations contained in Paragraph 83 of Plaintiff's Second Amended Complaint.

84. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 84 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

85. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 85 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

86. In answering Paragraph 86 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

87. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 87 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

88. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 88 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

89. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 89 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

90. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 90 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

91. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 91 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

92. In answering Paragraph 92 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

93. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 93 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

94. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 94 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

95. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 95 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

96. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 96 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

97. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 97 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

98. In answering Paragraph 98 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

99. The allegations contained in Paragraph 99 of Plaintiff's Second Amended Complaint are legal conclusions for which no answer is necessary or required; to the extent an answer is deemed necessary or required, denies the same and puts Plaintiff to her proof thereon.

100. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 100 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

101. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 101 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

102. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 102 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

103. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 103 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

104. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 104 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

105. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 105 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

106. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 106 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

107. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 107 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

108. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 108 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

109. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 109 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

110. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 110 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.



111. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 111 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

112. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 112 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

113. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 113 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

114. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 114 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

115. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 115 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

116. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 116 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

117. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 117 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

118. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 118 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

119. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 119 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

120. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 120 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

121. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 121 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

122. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 122 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

123. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 123 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

124. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 124 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

125. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 125 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

126. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 126 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

127. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 127 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

128. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 128 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

129. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 129 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

130. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 130 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

131. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 131 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

132. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 132 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

133. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 133 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

134. In answering Paragraph 134 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

135. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 135 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

136. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 136 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

137. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 137 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

138. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 138 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

139. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 139 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

140. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 140 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

141. In answering Paragraph 141 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

142. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 142 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

143. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 143 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

144. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 144 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

145. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 145 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

146. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 146 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

147. In answering Paragraph 147 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

148. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 148 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

149. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 149 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

150. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 150 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

151. In answering Paragraph 151 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

152. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 152 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

153. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 153 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

154. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 154 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

155. In answering Paragraph 155 of Plaintiff's Second Amended Complaint, denies that Defendant Christensen was operating within the scope of his employment when he committed the alleged negligent infliction of emotional distress. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained therein, and therefore denies the same and puts Plaintiff to her proof thereon.

156. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 156 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

157. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 157 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

158. In answering Paragraph 158 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

159. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 159 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

160. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 160 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

161. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 161 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

162. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 162 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

163. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 163 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

164. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 164 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

165. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 165 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

166. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 166 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.



167. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 167 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

168. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 168 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

169. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 169 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

170. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 170 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

171. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 171 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

172. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 172 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

173. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 173 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

174. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 174 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

175. In answering Paragraph 175 of Plaintiff's Second Amended Complaint, Intervenor realleges and incorporates by reference the preceding paragraphs of its Answer as if fully set forth herein.

176. In answering Paragraph 176 of Plaintiff's Second Amended Complaint, denies that Defendant Christensen was acting within the scope of his employment when he engaged in the alleged sexual contact with Plaintiff. Denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained therein, and therefore denies the same and puts Plaintiff to her proof thereon.

177. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 177 of Plaintiff's Second Amended Complaint, and therefore denies the same and puts Plaintiff to her proof thereon.

178. Denies all allegations contained in Plaintiff's Second Amended Complaint that are not affirmatively admitted herein.

#### AFFIRMATIVE DEFENSES

Intervenor WCMIC further answering Plaintiff's Second Amended Complaint by way of an affirmative defense applicable to all claims for relief alleges as follows:

1. The policy or policies of insurance issued by WCMIC to Polk County do not provide coverage to Defendant Christensen for the alleged acts set forth in Plaintiff's Second Amended Complaint; and

2. Intervenor incorporates by reference its Complaint for Declaratory Judgment as if fully set forth herein.

WHEREFORE, Intervenor WCMIC respectfully demands judgment dismissing Plaintiff's Second Amended Complaint and awarding WCMIC its costs, attorneys' fees and such other relief the Court deems just and equitable.

Dated this 13<sup>th</sup> day of July, 2016.

s/ Lori M. Lubinsky  
Attorneys for Intervenor  
Wisconsin County Mutual Ins. Corporation  
AXLEY BRYNELSON, LLP  
P.O. Box 1767  
Madison, WI 53701-1767  
Telephone: (608) 257-5661  
Fax: (608) 257-5444  
Email: [llubinsky@axley.com](mailto:llubinsky@axley.com)

\\axleyserver2\axley\EAFDATA\2961\74780\01992627.DOCX